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6 Attorney for Defendant  
CHRISTIAN FLORES

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) Case No. 2:22-CR-00168-JAM-1  
11 Plaintiff, )  
12 vs. ) STIPULATION REGARDINT EXCLUDABLE  
13 CHRISTIAN FLORES, ) TIME PERIODS UNDER SPEEDY TRIAL  
14 Defendant. ) ACT; ORDER  
15 \_\_\_\_\_ ) Date: January 24, 2023  
                        ) Time: 9:00 a.m.  
                        ) Court: Hon. John A. Mendez

16 **STIPULATION**

- 17 1. By previous order, this matter was set for a status conference on January 24, 2023.
- 18 2. By this stipulation, Defendant Christian Flores now moves to continue the status  
conference until May 9, 2023, at 9:00 a.m., and to exclude time between January 24,  
2023 and May 9, 2023 under Local Code T4.
- 21 3. The parties agree and stipulate, and request that the Court find the following:
- 22     a) The government has represented that the discovery associated with this case has been  
produced to counsel and is preparing to produce supplemental discovery.
- 23     b) Counsel for defendant desires additional time to review the discovery, consult with  
her client, conduct defense investigation, discuss potential resolution options, and  
otherwise prepare for trial.
- 24     c) Counsel for Mr. Flores believe the failure to grant the above-requested continuance  
would deny him the reasonable time necessary for effective preparation, taking into

1 account the exercise of due diligence.

- 2 d) The government does not object to the continuance.
- 3 e) Based on the above-stated findings, the ends of justice served by continuing the case  
4 as requested outweigh the interest of the public and Mr. Flores in a trial within the  
5 original date prescribed by the Speedy Trial Act.
- 6 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et  
7 seq., within which trial must commence, the time period of January 24, 2023 to May  
8 9, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv)  
9 [Local Code T4] because it results from a continuance granted by the Court at  
10 defendant's request on the basis of the Court's finding that the ends of justice served  
11 by taking such action outweigh the best interest of the public and the defendant in a  
12 speedy trial.

13

14 Dated: January 18, 2023

HEATHER E. WILLIAMS  
Federal Defender

16 */s/ Meghan McLoughlin*  
17 MEGHAN MCLOUGHLIN  
18 Assistant Federal Defender  
Attorney for Defendant  
CHRISTIAN FLORES

19 Dated: January 18, 2023

*/s/ Justin L. Lee*  
JUSTIN L. LEE  
Assistant United States Attorney

22 **ORDER**

23 IT IS SO ORDERED this 18<sup>th</sup> day of January, 2023.

26 Dated: January 18, 2023

*/s/ John A. Mendez*

27 THE HONORABLE JOHN A. MENDEZ  
28 SENIOR UNITED STATES DISTRICT JUDGE